

Exhibit U

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

CAROLYN WEIRICK and
ELVIRA GRACIELA
ESCUDERO LORA,
Plaintiffs,

CASE NO.

vs.

JCCP 4674/BC656425

BRENNTAG NORTH
AMERICA, INC. (Sued
individually and as
successor-in-interest
to MINERAL PIGMENT
SOLUTIONS, INC. and as
successor-in-interest
to WHITTAKER CLARK &
DANIELS, INC.), et
al.,

Defendants.

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Deposition of WILLIAM E. LONGO Ph.D.,

Taken by Matthew L. Bush,

Before Jennifer D. Hamon,
Certified Court Reporter,

At the Offices of Atlanta Reporters,
Johns Creek, Georgia,

On Wednesday, April 17, 2019,
Beginning at 11:07 a.m. and ending at 3:28 p.m.

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1 Q And after August 2017, you used
2 different test methods than you originally did.
3 I'm talking about ISO-PLM and Blount PLM. Why
4 did you decide to test under ISO-PLM?

5 A We wanted to see -- because I have
6 been testifying that the typical R93 or PLM
7 analysis was not the way to go for these trace
8 analyses because of sensitivity issues, and we
9 decided to see if we could enhance the ISO-PLM
10 analysis and then compare it to a Blount.

11 Where a typical PLM analysis for
12 asbestos-added products, the analyst may spend 10
13 minutes on it, 15 minutes because of the
14 concentrations of asbestos, what we did was take
15 the optical microscope and change out one of the
16 objective lenses to what's called an aberration
17 corrected lenses so you get better resolution.

18 And instead of 15 minutes, our two
19 analysts, mainly Paul Hess, spends anywhere from
20 two to six hours on one sample and does it all
21 under dispersion staining. And then we have a
22 high-resolution camera attached to the polarized
23 light microscope and a high-resolution monitor so
24 that they can view the structure in more detail
25 to see if there was a way that the PLM analysis

1 could be made much more sensitive.

2 And the Blount PLM analysis is a heavy
3 liquid concentration, and we wanted to compare
4 the two.

5 Q So you test each MDL model with the
6 three tests, the ISO-PLM, the Blount PLM, and the
7 TEM; correct?

8 A Correct.

9 Q Do you have an explanation for why one
10 test may be positive and some tests will be
11 nondetect for the same sample?

12 A Because they're really looking at
13 different things. The TEM analysis, and I've
14 testified -- and I testified in the Weirick case
15 is biassed against very large bundles. We've
16 seen this over and over again over the years in
17 other unrelated cases, and the PLM analysis is
18 only finding these very large bundles.

19 The Blount PLM is biassed against low
20 iron anthophyllite as well as concentrating it,
21 concentrating the tremolite and actinolite, so
22 finding positives in the Blount PLM, because
23 we're looking at a lot more material than TEM.

24 But overall, TEM's still the most
25 sensitive method, the Blount PLM next, and then

1 under any contract that is prohibited by
2 OCGA 15-14-37(a) and (b) or Article 7.C. of the
3 Rules and Regulations of the Board; and I am not
4 disqualified for a relationship of interest under
5 OCGA 9-11-28(c).

6 There is no contract to provide
7 reporting services between myself or any person
8 with whom I have a principal and agency
9 relationship nor any attorney at law in this
10 action, party to this action, party having a
11 financial interest in this action, or agent for
12 an attorney at law in this action, party to this
13 action, or party having a financial interest in
14 this action. Any and all financial arrangements
15 beyond my usual and customary rates have been
16 disclosed and offered to all parties.

17 This 19th day of April, 2019.

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19 
20 JENNIFER D. HAMON, CCR B-2287
21 Certified Court Reporter
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